

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

CHEVRON CORP.,

Plaintiffs,

-against-

Case No. 1:12-MC-65 LAK/CFH

Hon. Lewis A. Kaplan

STEVEN DONZIGER, *et al.*,

Defendants.

**DECLARATION OF JOHN DOE (OWNER OF SIMEONTEGEL@HOTMAIL.COM) IN
SUPPORT OF NON-PARTY JOHN DOES' MOTION FOR RECONSIDERATION**

Using my email addresses, simeontegel@hotmail.com, instead of my actual name, in order to protect my identity pursuant to my rights under the First Amendment and New York law, I declare as follows:

1. I am the owner of the email account simeontegel@hotmail.com. I have personal knowledge of all matters set forth in this declaration. If called upon to do so, I could and would testify to all matters set forth herein.
2. I am providing this declaration under my email address because I wish to protect my rights to free speech and participation in associational activities. I also wish to avoid making moot these very issues, which I have raised in this motion. A true and correct copy of my actual signature for this document resides with my attorneys.
3. I am, and have always been, a citizen of the United States of America. I hold a valid US passport.
4. I have spent the majority of the nine years covered by Chevron's discovery request living in the United States.

5. I have had my Hotmail email address since at least 1999 and I have used it as my primary address ever since. I use this email address to regularly communicate with other Americans, often from sensitive locations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 8, 2013.


SIMEONTEGEL@HOTMAIL.COM